

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Attorneys For Debtor Judith Carr

In Re:

JUDITH CARR,

Debtor.

Case No.: 23-17710

Chapter 11

Judge: Christine M. Gravelle

CERTIFICATION OF TIMOTHY P. NEUMANN

Timothy P. Neumann, of full age, hereby certifies as follows:

1. I am the attorney for Judith Carr, the debtor and debtor-in-possession (“the “Debtor”) in the above-captioned Chapter 11 proceeding.
2. On behalf of the Debtor, I filed a motion (Dkt. 23, the” Sale Motion”) seeking an order authorizing sale of the Debtor’s real property commonly known as 23 Silverleaf Way, Manalapan, Monmouth County, New Jersey (the “Real Property”).
3. An objection (the “SLS Objection”) to the Sale Motion was filed on behalf of Specialized Loan Servicing LLC as servicing agent for HSBC Bank USA, National Association, as Trustee to Wells Fargo Bank, N.A. as Trustee for Bear Stearns Mortgage Funding Trust 2006-AC1, Asset-Backed Certificates, Series 2006-AC1(“SLS”) in which SLS has asserted that it is the holder of a first priority mortgage on the Real Property securing an indebtedness in the amount of \$1,586,951.00 as of February 29, 2024.

4. The SLS Objection states that, “Notwithstanding the above, Creditor remains open to discuss options for the potential sale of the property via its undersigned counsel.”
5. The Real Property has been appraised as having a fair market value of \$1,300,000. See copy of appraisal report annexed as **Exhibit A**.
6. Property Inspection and Termite Reports were also obtained, copies of which are annexed hereto as **Exhibits B** and **C** respectively and reflect substantial deferred maintenance and other potential conditions requiring remediation.
7. After the filing of the Sale Motion I accepted the invitation to seek a consensual resolution of the SLS Objection. I ascertained that the purchaser would be willing to increase her offer and that SLS would evaluate any increased offer and I supplied SLS with copies of the Property Inspection and Termite Reports.
8. The ensuing process culminated on March 21, 2024 with the parties agreeing upon an increase in the sale price which would yield a payment to SLS of \$1,175,000.00.
9. This means that the purchaser will pay all associated costs of the transaction and be required to satisfy any nonavoidable liens or take title subject to any such liens. The website for Manalapan shows that as of May 1, 2024, there will be real property taxes for the first and second quarters of 2024 in the amount of \$6,191.33.
10. Annexed hereto as Exhibit D is a copy of a proposed Order approving the sale, the form and terms of which have been consented to by SLS.

I hereby certify that the statements of fact set forth above are true. I am aware that if the above statements are willfully false, I am subject to punishment.

/s/ Timothy P. Neumann
Timothy P. Neumann

Date: March 22, 2024